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*Counsel for Movant the IREN Investor Group  
and Proposed Liaison Counsel*

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS,  
BELINDA NUCIFORA, DAVID  
BARTHOLOMEW, CHRISTOPHER  
GUZOWSKI, and MICHAEL  
ALFRED,

Defendants.

Case No. 2:22-cv-7273-JMV-MAH

Class Action

Honorable John Michael Vazquez

**MOTION DAY: March 20, 2023**

**ORAL ARGUMENT REQUESTED**

**Reply Memorandum of Law in Further Support of the IREN Investor  
Group's Motion for Appointment of Lead Plaintiff and  
for Approval of Selection of Lead Counsel**

Movants Network Racing Pty Ltd., Nahi Beaini, LRJ Superannuation Fund, and De Stoop Investments Pty Ltd. (together, the “IREN Investor Group”) respectfully states the following in further support of the IREN Investor Group’s motion, under Section 27(a)(3)(B) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3)(B), and Section 21D(a)(3)(B) of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, for appointment as lead plaintiff and for approval of selection of lead counsel and liaison counsel.

1. Because both competing motions (Dkt. Nos. 25, 27) have been withdrawn, *see* Dkt. Nos. 28–29, the IREN Investor Group is the only remaining movant.
2. For the reasons set forth in the IREN Investor Group’s motion (Dkt. No. 26) and opposition brief (Dkt. No. 30), the Court should grant the IREN Investor Group’s motion in its entirety.

Dated: March 13, 2023

Respectfully submitted,

COHN LIFLAND PEARLMAN

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s/ Peter S. Pearlman

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